

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

ROCHE CYRULNIK FREEDMAN LLP

Plaintiff,

v.

JASON CYRULNIK

Defendant.

No. 1:21-cv-1746 (JGK)

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
BRIEFING SCHEDULE ON MOTION
TO DISMISS THE AMENDED
COMPLAINT**

Plaintiff Roche Cyrulnik Freedman LLP and Defendant Jason Cyrulnik, by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, on July 2, 2021, Plaintiff filed an amended complaint (the “Amended Complaint”), Dkt. No. 31;

WHEREAS, on August 13, 2021, Defendant filed a motion to dismiss the Amended Complaint (the “Motion to Dismiss”), Dkt. No. 36;

IT IS ACCORDINGLY STIPULATED, by and between the undersigned counsel for the Parties, subject to the Court’s approval, as follows:

1. Plaintiff shall file their opposition on September 21, 2021.
2. Defendant shall file his reply on October 13, 2021.

Dated: August 24, 2021
New York, NY

Respectfully submitted,

KAPLAN HECKER & FINK LLP

KASOWITZ BENSON TORRES LLP

/s/ Sean Hecker

Sean Hecker
350 Fifth Avenue, Suite 7110
New York, NY 10118
Telephone: (212) 763-0883
Email: shecker@kaplanhecker.com

ROCHE FREEDMAN LLP

/s/ Eric S. Rosen

Eric S. Rosen
99 Park Avenue, 19th Floor
New York, NY 10016
Telephone: (646) 350-0527
Email: erosen@rcflp.com

/s/ Gavin D. Schryver

Marc E. Kasowitz
Michael A. Hanin
Gavin D. Schryver
1633 Broadway
New York, NY 10019
Telephone: (212) 506-1700
Email: mkasowitz@kasowitz.com
Email: mhanin@kasowitz.com
Email: gschryver@kasowitz.com

SO ORDERED:

Dated: _____, 2021

Hon. John G. Koeltl
United States District Judge